

August 16, 2018

Mr. Mike Stoker
Regional Administrator
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Stoker:

The California Air Resources Board (CARB or Board) is submitting to the U.S. Environmental Protection Agency (U.S. EPA) the 2013 amendments to the *California Cargo Tank Vapor Recovery Regulation* (2013 Cargo Tank Amendments) as a revision to the California State Implementation Plan (SIP), under California Code of Regulations (CCR) Title 17, section 94014, which incorporates by reference Certification Procedure 204 (CP-204) and Test Procedures (TP) 204.1, 204.2, and 204.3.

U.S. EPA requires the submission of SIPs for nonattainment areas classified as moderate or above to demonstrate that sources meet Reasonable Available Control Technology (RACT) level controls. U.S. EPA publishes Control Techniques Guidelines (CTG) that establish RACT control limits for specific categories of sources that emit volatile organic compounds. CARB is submitting the 2013 Cargo Tank Amendments to satisfy RACT requirements. The 2013 amendments to CCR Title 17, section 94014; CP-204; and TP 204.1, 204.2, and 204.3 update and supersede the corresponding cargo tank vapor recovery documents currently in the SIP: CCR Title 17, section 94004, Certification of Vapor Recovery Systems – Gasoline Delivery Tanks, and Method 2-5, Certification and Test Procedures for Vapor Recovery Systems of Gasoline Delivery Tanks.

CARB's submittal consists of the following items:

- 1) CARB Resolution 18-23 directing CARB staff to submit the 2013 Cargo Tank Amendments as a revision to the California SIP.
- 2) Public Hearing Notice for the CARB Board Hearing on June 28, 2018.
- 3) Comment Log demonstrating a comment was received with attached comment letter.

Mr. Mike Stoker
August 16, 2018
Page 2

- 4) Statement made by the Chair at the hearing in response to public comment.
- 5) SIP Completeness Checklist.
- 6) Regulatory documentation for Certification Procedure 204 and Test Procedures 204.1, 204.2, and 204.3.

If you have any questions, please contact Mr. Kurt Karperos, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Dr. Michael Benjamin, Chief, Air Quality Planning and Science Division at (916) 201-8968.

Sincerely,



Richard W. Corey
Executive Officer

Enclosures

cc: Mr. Kurt Karperos
Deputy Executive Officer
California Air Resources Board

Dr. Michael Benjamin, Chief
Air Quality Planning and Science Division
California Air Resources Board